REMARKS

The present application includes pending claims 1-41, all of which have been rejected. By this Amendment, claims 1, 12, 21, 26 and 37 have been amended.

Claims 12-24 and 37-41 stand rejected under 35 U.S.C. 102(e) as being anticipated by United States Patent No. 7,065,778 ("Lu"). Claims 1-11 and 26-36 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Lu in view of United States Patent No. 7,055,104 ("Billmaier"). Claim 25 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Lu in view of United States Patent No. 6,477,708 ("Sawa"). The Applicants respectfully traverse these rejections for at least the reasons previously discussed during prosecution and the following.

As an initial matter, independent claims 1, 12, 21, 26 and 37 have been amended to make abundantly clear that the first and second locations are **not** the same.

I.   Lu Does Not Anticipate Claims 12-24 And 37-41

The Applicants first turn to the rejection of claims 21-24 and 37-41 as being anticipated by Lu.

A.   Claims 12-20

Claim 12 recites, in part, "a user interface, **at the first location**, having at least one view comprising a representation of media available for consumption, the user interface supporting the selection and scheduling of media for delivery at a **second location**."

Lu, on the other hand, "relates to the field of utilizing personalized video recorders and other similar types of devices to distribute television programming." *See* Lu at column 1, lines 7-11. In particular, Lu discloses a system in which a user is able to record a show that is transmitted in another broadcast area. *See id.* at Abstract.

For example, Lu describes the following:

> Specifically, personalized video recorder 200 is coupled to the
> Internet 302 such that it can receive an electronic programming
> guide (EPG) containing worldwide television programming from
> an EPG server computer 304. The user of personalized video
> recorder 200 utilizes the EPG to request delivery of a specific
> television show that may not be available to him or her. Upon
> reception of the request from personalized video recorder 200,
> EPG server computer 304 locates via Internet 302 one or more
> personalized video recorders... situated within a broadcast region
> of the requested television show. Subsequently, EPG server
> computer 304 programs one or more personalized video
> recorders... to record the requested television show when it is
> broadcast by a television content provider.... Once the
> personalized video recorders... record the television show, one or
> more of the personalized video recorders may transmit it to EPG
> server computer 304 which then transmits it to the requested
> personalized video recorder 200. In this manner, the present
> embodiment enables personalized video recorder 200 to order and
> receive specific television shows that are unavailable from its
> television content provider....

Lu at column 6, lines 39-61. Thus, Lu discloses a system in which a user sends a recording

request that is received by a server computer via the Internet. The server computer then

arbitrarily locates a recorder within the broadcast region of the show, and then sends the recorded

show back to the requesting user.

Lu does not describe, teach, or suggest a "**a user interface, at the <u>first location</u>**, having

at least one view comprising a representation of media available for consumption, the **user**

interface [at the <u>first location</u>] supporting the selection and scheduling of media for delivery at

a <u>second location</u>," as recited in claim 1. The claim is clear that the user interface at the **first**

location supports the selection and scheduling of media for delivery **at the second location.**

There is absolutely nothing in Lu that describes, teaches or suggests such limitations.

Nevertheless, The Office Action continues to cite Lu at **column 6, lines 43–45 and 50–58**

as disclosing these limitations. *See* February 4, 2008 Office Action at pages 2 and 5. These

portions of Lu recite, however, the following:

> The user of personalized video recorder 200 utilizes the EPG
> [electronic programming guide] to request delivery of a specific
> television show that may not be available to him or her.
>
> * * *
>
> Subsequently, EPG server computer 304 programs one or more
> personalized video recorders (e.g., 200A and/or 200B) to record
> the requested television show when it is broadcast by a television
> content provider (e.g., television head-end 308). Once the
> personalized video recorders (e.g., 200A and 200 B) record the
> television show, one or more of the personalized video recorders
> may transmit it to EPG server computer 304 which then transmits
> it to the requesting personalized video recorder 200.

Lu at column 6, lines 43–58. Thus, in Lu, the user requests delivery for a television show **at**

his/her location through the EPG. The EPG then arbitrarily locates a PVR in another area to

record the show. After the show is recorded, the show is delivered **to the user at his/her**

location via the EPG server. **In Lu, selection and delivery of the show both occur at a single**

location. That is, the user selects the show from his/her location, and the show is eventually

delivered to that same location.

As noted above, the Office Action cites Lu at column 6, lines 43–45, as disclosing the

relevant claim limitations. This portion of Lu recites, however, the following:

> The user of personalized video recorder 200 utilizes the EPG to
> request delivery of a specific television show that may not be
> available to him or her.

Clearly, the user is not traveling from his/her home to the location of the EPG to request

delivery. Instead, the user requests delivery from his/her home. That request is then sent to the

EPG, which then arbitrarily locates a PVR in the broadcast area of the show. The recorded show is then sent back to the user at his/her home. Again, the request/selection of a television show is performed at the user's home (i.e., a first location). The show is then delivered to the user's home (i.e., the first location). **There is <u>absolutely nothing</u> in Lu that describes, teaches or suggests,** however, a "user interface at the first location supporting the **selection <u>and</u> scheduling of media delivery to a second location**," as recited in claim 12. Further, the Applicants demonstrate above that the portions of Lu that the Office Action relies on as allegedly disclosing these limitations, clearly do not describe, teach or suggest the limitations.

Lu does not describe, teach or suggest a system in which a user at a first location selects a show that is delivered to a completely different location, as recited in this limitation (i.e., "user interface, **at the <u>first</u> location**, supporting the selection and scheduling of media delivery **to a second location**"). Neither the cited passages, nor the remainder, of Lu describes, teaches or suggests a "user interface, at the **first location**, supporting the selection and scheduling of media delivery **to a second location**," as recited in claim 1. Thus, for at least this reason, the Applicants respectfully submit that Lu does not anticipate claims 12-20.

The Office Action states that "Applicant argues Lu does not teach a system in which a user at a first location selects a show that is delivered to complete [sic] different [sic], however this limitation cannot be found in the claim." *See* February 4, 2008 Office Action at page 3.

As clearly shown above, however, claim 12 recites, in part, "Claim 12 recites, in part, "a user interface, **at the first location**, having at least one view comprising a representation of media available for consumption, the user interface supporting the selection and scheduling of media for delivery at **a second location**." The Applicants respectfully submit that the claim is

clear that the user interface **at the first location** supports the selection and scheduling of media

for delivery **at a second location**." If the Examiner still requires clarification, the Applicants

respectfully request that the Examiner schedule an interview with the Applicants and the

Examiner's supervisor, as this claim language is clear and understandable on its face. However,

the Applicants respectfully submit that the claim rejections should be reconsidered for at least the

reasons discussed above.

B. Claim 19

Additionally, claim 19 recites, in part, "wherein the at least one multimedia display

comprises: **at least one sensor _for detecting_ a condition**, at the first home; and the detection of

the condition resulting in a change in the media displayed." The Office Action cites Lu only at

column 6, lines 8-17 as disclosing this limitation. *See* February 4, 2008 Office Action at page 8.

However, this portion of Lu states the following:

> Additionally, the personalized video recorder 200 of FIG. 2 can
> include an optional remote control device 216 (e.g., a universal
> remote control device having a number of buttons, dials, etc.)
> which is communicatively coupled to bus 210 for communicating
> user input information and command selections to the central
> processor(s) 202. It is appreciated that remote control device 216
> may be implemented with the capability to communicate with
> personalized video recorder 200 utilizing wireless communication
> (e.g., infrared signaling).

Lu at column 6, lines 8-17. This portion of Lu (the only portion of Lu the Office Action cites to

reject claim 19) merely discloses a remote control that may be used with the PVR. Remote

controls transmit signals to a device to operate the device, etc. Lu does not disclose that the

remote control itself receives any signals or "detects" anything. In short, nothing in this passage

describes, teaches or suggests "at least one sensor for detecting a condition, at the first home; and

the detection of the condition resulting in a change in the media displayed," as recited in claim

19. Thus, for at least this additional reason, the Office Action has wholly failed to establish a

prima facie case of anticipation with respect to claim 19.

C. Claims 21-24

Claim 21 recites, in part, "**scheduling media for delivery from a <u>first location</u> to a

<u>second location</u> based on input from the user at <u>the second location</u>**." The Applicants

respectfully submit that the Office Action has not established a *prima facie* case of anticipation

with respect to claims 21-24, nor does Lu anticipate these claims for at least the reasons

discussed above in Section I.A.

II. The Proposed Combination Of Lu And Billmaier Does Not Render Claims 1-11 And 26-36 Unpatentable

The Applicants now turn to the rejection of claims 1-11 and 26-36 as being unpatentable

over Lu in view of Billmaier. Claim 1 recites, in part, "a user interface, **at the first location**,

having at least one view comprising a representation of media available for consumption, the

user interface supporting the selection and scheduling of media for delivery **to a second

location**." The Office Action relies on Lu as disclosing the limitations. *See* February 4, 2008

Office Action at page 12. As the Applicants demonstrate above in Section I.A., however, Lu

does not describe, teach or suggest these limitations. Thus, for at least this reason, the

Applicants respectfully request reconsideration of the rejection of claims 1-11.

Claim 1 also recites, in part, "server software that maintains a **<u>user defined</u> association**

of the first and second network addresses [with respect to first and second users, respectively, at

first and second locations, respectively, who are known to each other]." The Office Action relies

on Lu as disclosing "server software that maintains a user defined association of the first and

second network addresses." *See* February 4, 2008 Office Action at page 13. The Applicants respectfully submit, however, that Lu is completely devoid of anything that describes, teaches or suggests these limitations.

Nevertheless, the Office Action cites Lu **only** at column 6, lines 54-58 as disclosing "server software that maintains a user defined association of the first and second network addresses." *See* February 4, 2008 Office Action at pages 3-4 and 13. This cited portion of Lu (again, the only portion of Lu that the Office Action cites as disclosing the relevant claim limitations) states, however, the following:

> Once the personalized video recorders (e.g., 200A and 200B) record the television show, one or more of the personalized video recorders may transmit it to EPG server computer 304 which then transmits it to the requesting personalized video recorder 200.

Lu at column 6, lines 54-58. This portion of Lu merely indicates that a recorder requests a show, and then the EPG arbitrarily finds another recorder in a broadcast area to record the show for the requesting recorder. This portion of Lu does not indicate that a **user defines** an association between first and second network addresses, or that a server **maintains** that **user defined association.** In general, there is nothing in this cited portion, nor the remainder, of Lu that describes, teaches or suggests "server software that **maintains a <u>user defined</u> association of the first and second network addresses,"** as recited in claim 1. Thus, for at least these reasons, the Office Action has not established a *prima facie* case of obviousness with respect to claims 1-11. Indeed, these claims are allowable over the cited art.

Claim 26 recites, in part, "software that maintains a user defined association of first and second network addresses with respect to first and second users, respectively, at first and second

18

location, respectively." The Applicants respectfully request reconsideration of the claim rejections for at least the reasons discussed above in Section II.

Claim 37 recites, in part, "set top box circuitry, in a set top box at **a first location**, communicatively coupled to the communication network to **support the management of display of media content at <u>a second location</u>**." The Applicants respectfully request reconsideration of this rejection for at least the reasons discussed above in Section I.A.

III. The Proposed Combination Of Lu And Sawa Does Not Render Claim 25 Unpatentable

The Applicants respectfully submit that the proposed combination of Lu and Sawa does not render claim 25 unpatentable for at least the reasons discussed above in Section I.

IV. Conclusion

As noted above, the Applicants respectfully submit that the Office Action has not established a *prima facie* case of anticipation or obviousness with respect to any of the pending claims. If, however, the Examiner intends to maintain these rejections, **the Applicants respectfully request an interview with the Examiner and his supervisor before a Final Office Action is mailed.**

In general, the Office Action makes various statements regarding claims 1-41 and the cited references that are now moot in light of the above. Thus, the Applicants will not address such statements at the present time. The Applicants expressly reserve the right, however, to challenge such statements in the future should the need arise (e.g., if such statement should become relevant by appearing in a future claim rejection).

The Applicants respectfully submit that the Office Action has not established a *prima facie* case of anticipation or obviousness with respect to any of the pending claims for at least the

reasons discussed above and request that the outstanding rejections be reconsidered and withdrawn. **Nevertheless, the Applicants invite the Examiner to contact the undersigned attorney to discuss potential amendments that will lead to an allowance in order to avoid an appeal to the Board of Patent Appeals and Interferences.** If the Examiner has any questions or the Applicants can be of any assistance, the Examiner is invited to contact the undersigned attorney for Applicants.

The Commissioner is authorized to charge any necessary fees, or credit any overpayment to the Deposit Account of McAndrews, Held & Malloy, Account No. 13-0017.

Respectfully submitted,

Date: February 25, 2008

McANDREWS, HELD & MALLOY, LTD.
500 West Madison Street, 34th Floor
Chicago, Illinois 60661
Telephone: (312) 775-8000
Facsimile: (312) 775-8100

/Joseph M. Butscher/
Joseph M. Butscher
Registration No. 48,326
Attorney for Applicants